

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
BECKLEY DIVISION**

UNITED STATES OF AMERICA

v.

DONALD L. BLANKENSHIP

)
)
)
)
)
)
)

Criminal No. 5:14-cr-00244

MOTION FOR PERMISSION FOR TRAVEL TO NORTH CAROLINA

Donald L. Blankenship, through counsel, respectfully moves the Court for an order permitting him to travel to the Raleigh, North Carolina area to attend to a business matter. The requested three-day-trip—one day to travel to North Carolina, one day in North Carolina, and one day to return to this District—will occur between August 17, 2015, and September 18, 2015. The Probation Office, which has been made aware of this request in advance of the submission of this motion, will be fully apprised of Mr. Blankenship's travel arrangements in advance of the trip, including the particular dates of travel and manner of transportation.

Should the Court desire additional information in its consideration of this request, undersigned counsel respectfully requests the opportunity to provide such detail *in camera* and under seal.

Dated: July 31, 2015

Respectfully submitted,

/s/ William W. Taylor, III

William W. Taylor, III

Blair G. Brown

Eric R. Delinsky

R. Miles Clark

Steven N. Herman

ZUCKERMAN SPAEDER LLP

1800 M Street, NW, Suite 1000

Washington, DC 20036

202-778-1800 (phone)

202-822-8106 (fax)

wtaylor@zuckerman.com

bbrown@zuckerman.com

edelinsky@zuckerman.com

mclark@zuckerman.com

sherman@zuckerman.com

/s/ James A. Walls

James A. Walls (WVSB #5175)

SPILMAN THOMAS & BATTLE, PLLC

48 Donley Street, Suite 800

P.O. Box 615

Morgantown, WV 26501

304-291-7947 (phone)

304-291-7979 (fax)

jwalls@spilmanlaw.com

Counsel for Donald L. Blankenship

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been electronically filed and service has been made
by virtue of such electronic filing this 31st day of July 2015 on:

R. Booth Goodwin, II
Steven R. Ruby
Gabriele Wohl
U.S. Attorney's Office
P.O. Box 1713
Charleston, WV 25326-1713

R. Gregory McVey
U.S. Attorney's Office
P.O. Box 1239
Huntington, WV 25714-1239

/s/ R. Miles Clark
R. Miles Clark